

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, by her parents and next friends
Sara Tirrell and Zachary Tirrell, *and*

Iris Turmelle, by her parents and next friends
Amy Manzelli and Chad Turmelle,

Plaintiffs,
v.
Civil Case No. 1:24-cv-00251

Frank Edelblut, *in his official capacity as
Commissioner of the N.H. Dep't of Education;*

**Andrew Cline, Kate Cassady, Ann Lane
Philip Nazzaro, Rajesh Nair, James Fricchione
and James Laboe**, *in their official capacities
as members of the N.H. State Board of Education;*

Pemi-Baker Regional School District;

Pembroke School District;

Donald J. Trump, *in his official capacity as President
of the United States,*

U.S. Department of Justice,

Pamela Bondi, *in her official capacity as Attorney
General of the United States,*

U.S. Department of Education; and

Denise L. Carter, *in her official capacity as
Acting Secretary of the U.S. Dep't of Education,
Defendants,*

and

Female Athletes United,

Intervenor-Defendant.

**PLAINTIFFS' MOTION TO EXTEND TIME TO
RESPOND TO STATE MOTIONS TO DISMISS
(WHICH IS EITHER ASSENTED TO OR UNOPPOSED BY ALL PARTIES)**

Pursuant to Local Rule 7.2 of the Rules of this Court, Plaintiffs, Parker Tirrell, by her parents and next friends Sara Tirrell and Zachary Tirrell, and Iris Turmelle, by her parents and next friends Amy Manzelli and Chad Turmelle (collectively, the “Plaintiffs”), move to extend the deadline by which the Plaintiffs must file a response to the Motions to Dismiss the Amended Complaint, ECF Nos. 128-29, filed by Defendants Frank Edelblut, Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro, Rajesh Nair, James Fricchione, and James Laboe (collectively, the “State Defendants”), and by Defendants President Donald J. Trump, the U.S. Department of Justice, U.S. Attorney General Pamela Bondi, the U.S. Department of Education, and U.S. Secretary of Education Denise L. Carter (collectively, the “Federal Defendants”), until August 22, 2025.

The School District Defendants, the State Defendants, and the Federal Defendants¹ assent to this motion. Counsel for Intervenor Female Athletes United stated that “intervenor isn’t part of the pending motions to dismiss” and “will take no position” on the plaintiffs’ request for extension of time.

In support of this motion, Plaintiffs state as follows:

1. On February 12, 2025, Plaintiffs filed their Amended Complaint, ECF No. 95, against the State Defendants and Federal Defendants, as well as the Pemi-Baker Regional School District and Pembroke School District (together, the “School District Defendants”);²
2. On February 21, 2025, Plaintiffs, State Defendants, and School District Defendants filed a Joint Motion to Stay All Deadlines, ECF No. 99, until the Federal Defendants, who were

¹ The United States does not oppose Plaintiffs’ motion and proposed extension as long as the United States also gets additional time for any reply, namely that any reply by the United States be due 21 days after the opposition.

² On February 21, 2025, both School District Defendants filed Answers to the Amended Complaint, ECF Nos. 97-98.

added to the Amended Complaint, *compare* ECF No. 4 with ECF No. 95, filed a responsive pleading which was granted via this Court's Endorsed Order on February 24, 2025;

3. On April 21, 2025, Federal Defendants filed a Motion to Extend Time to Respond to Plaintiffs' Amended Complaint, ECF No. 123, until June 4, 2025, which was granted via this Court's Endorsed Order on April 23, 2025;

4. On June 3, 2025, Federal Defendants filed a Motion to Extend Time to Respond to Plaintiffs' Amended Complaint, ECF No. 127, until June 6, 2025 which was granted via this Court's Endorsed Order on June 4, 2025;

5. On June 6, 2025, both the State Defendants and Federal Defendants filed their respective Motions to Dismiss the Amended Complaint, ECF Nos. 128-29;

6. On June 13, 2025, Plaintiffs filed an Assented-To Motion to Extend Time to File a Responsive Pleading to State Defendants' and Federal Defendants' Motions to Dismiss, ECF No. 131, which was granted on June 16, 2025;

7. Plaintiffs' responses to each of the State Defendants' and Federal Defendants' Motions to Dismiss are currently due on August 1, 2025;

8. Plaintiffs require an extension of time, until August 22, 2025, to prepare adequate responses to each of the State Defendants' and Federal Defendants' Motions to Dismiss; and

9. No currently scheduled trial or hearing will be delayed by the granting of this Motion.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court grant the following relief:

A. Extend the time for Plaintiffs to respond to each of the State Defendants' and Federal Defendants' Motions to Dismiss until August 22, 2025; and

B. Grant such other and further relief as the court deems just and proper.

Respectfully submitted,

PARKER TIRRELL, by her parents and next friends SARA TIRRELL and ZACHARY TIRRELL,

and

IRIS TURMELLE, by her parents and next friends AMY MANZELLI and CHAD TURMELLE,

By and through their attorneys,

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*Admitted *pro hac vice*.

July 20, 2025

CERTIFICATE OF SERVICE

I hereby certify that, on this date, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all those registered with the ECF system.

Dated: July 20, 2025

/s/ Chris Erchull
Chris Erchull